



286229

WORK PLAN

1.0 INTRODUCTION

The following Work Plan describes the construction activities that U.S. EPA requires to be performed by the UAO Responsible Parties ("RPs") to address the containment of on-site soils within the central processing area at the RRG/Clayton Chemicals Site ("Site") as shown on Exhibit 1. The work consists of installing a RCRA/TSCA compliant cap over the central processing area at the Site.

2.0 CAP INSTALLATION

2.1 Cap Location and Profile

In accordance with the U.S. EPA approved cap design attached hereto as Exhibit 1, a cap, approximately 1.8 acres in size, shall be installed at the Site. The cap shall cover the central processing area at the Site, including additional SWMU numbers 3, 20, 21 and 22 as shown on Exhibit 1. The cap shall be constructed in accordance with RCRA/TSCA requirements, utilizing the components and general profile included on Exhibit 1, and shall be designed to accommodate potential future use of the site while minimizing any on-going operations and maintenance (O&M) requirements. A narrative describing the cap design is included in Exhibit 2, and the drainage layer parameters are included as Exhibit 3. The RPs shall submit, for U.S. EPA approval, more detailed design and construction drawings as appropriate, or as requested by U.S. EPA.

Following the construction of the cap, the RPs shall prepare an O&M plan for maintenance of the cap.

2.2 Project Schedule for Cap Installation

The RPs shall propose the selection of a cap contractor within 5 days of the effective date of the UAO. If U.S. EPA disapproves the selection for legitimate reason, the RP's shall contract with a contractor selected by U.S. EPA to perform the work covered by this Work Plan and UAO. Cap installation shall begin upon U.S. EPA approval of the RP's letter outlining their performance of the removal activities as set forth in the Amended Work Plan, and U.S. EPA approval of contractor confirmation that the critical cap components (low permeability clay layer and synthetic components) can be installed to meet applicable standards without risk of frost damage.

The schedule for performance is presented below. U.S. EPA acknowledges that the availability of capping materials and adverse weather conditions could affect the schedule.

<u>Activity</u>	<u>Estimated Duration (in weeks)</u>
Install Grading Layer	0.5 weeks
Install Compacted Clay Layer	1-2 weeks after grading layer installed
Test Compacted Clay Layer	1 week after clay layer installed
Install CGL layer	1-1.5 weeks after clay compaction testing

Install Drainage Layer	0.5 weeks after installing CGL layer
Install Rooting Zone	1 week after installing drainage layer
Install Topsoil/Vegetation Layer	0.5 week after installing rooting zone
Contingency/Weather Delays	0.5-2 weeks
Total	6.0-9.0 weeks anticipated